

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO. 04-CV-11193-NG

SHAWN DRUMGOLD,)
)
Plaintiff)
)
vs.)
)
TIMOTHY CALLAHAN, FRANCIS M.)
ROACHE, PAUL MURPHY, RICHARD)
WALSH, AND THE CITY OF BOSTON)
)
Defendants)
)

DEFENDANT TIMOTHY CALLAHAN'S MANDATORY
DISCLOSURE PURSUANT TO FED.R.CIV.P. RULE 23(a) AND LOCAL RULE 26.2

Defendant Timothy Callahan hereby makes the following disclosures, pursuant to
Fed.R.Civ.P. Rule 26(a) and Local Rule 26.2:

1. In addition to the plaintiff, the following individuals are likely to have
discoverable information:

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Callahan reserves the right to amend and supplement this list throughout the discovery period in this case.

2. Documentation:

Callahan does not have documents pertaining to this matter other than the transcripts of the original pre-trial hearings, trial, and motion for new trial hearings, which have previously been provided by counsel for the plaintiff.

Callahan reserves the right to amend and supplement this list throughout the discovery period in this case.

3. Damages:

Not applicable.

4. Insurance coverage:

No insurance is available to satisfy all or part of any judgment which may be entered against Callahan in this matter.

Callahan reserves the right to supplement this disclosure statement.

Respectfully submitted,
Defendant Timothy Callahan
By his attorney:

____/s/ Mary Jo Harris _____
Mary Jo Harris, BBO # 561484
Special Assistant Corporation Counsel
Morgan, Brown & Joy, LLP
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Dated: December 5, 2005

CERTIFICATE OF SERVICE

I, Mary Jo Harris, hereby certify that a copy of the foregoing document was served via ECF filing to all other parties of record on this 5th day of December, 2005, and served via first class mail, postage prepaid to
Donald R. Faymen, 640 Main Street, Malden, MA 02148

____/s/ Mary Jo Harris _____
Mary Jo Harris